

**BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Certification of	)	Case No. 00-2317-EL-GAG
Northeast Ohio Public Energy Council as	)	
Governmental Aggregator	)	
	)	
In the Matter of the Complaint and Request	)	Case No. 22-0817-EL-CSS
for Emergency Interim Relief by Dynegy	)	
Marketing and Trade, LLC Against the	)	
Northeast Ohio Public Energy Council	)	
	)	
In the Matter of the Motion of Northeast	)	Case No. 22-0806-EL-WVR
Ohio Public Energy Council for a Limited	)	
Waiver of Rule 4901:1-10-29(H), Ohio	)	
Administrative Code	)	

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**MOTION FOR PERMISSION TO APPEAR PRO HAC VICE**

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Pursuant to Ohio Adm.Code 4901-1-08(B) and Gov. Bar. R. XII(2)(A)(6), Dynegy Marketing and Trade, LLC (“Dynegy Marketing & Trade”) hereby respectfully moves for the Public Utilities Commission of Ohio (the “Commission”) to grant Glenn S. Benson permission to appear *pro hac vice* and participate as counsel for Dynegy Marketing & Trade in the above-captioned proceedings.

The following is a list of jurisdictions in which Glenn S. Benson has ever been licensed to practice law, including his dates of admission to practice and attorney registration numbers:

- (i) State Bar of New York, Bar No. 2589323, Admitted Jan. 25, 1994
- (ii) The District of Columbia Bar, Bar No. 446887, Admitted June 5, 1995

Mr. Benson has not been granted permission to appear *pro hac vice* in more than three proceedings before Ohio tribunals in the current calendar year pursuant to Gov. Bar Rule XII(2)(A)(5).

David F. Proaño (0078838), an attorney licensed to practice in the State of Ohio in good standing, has agreed to associate with Mr. Benson in this proceeding.

Attached is a copy of the certificate of *pro hac vice* registration for Mr. Benson, furnished by the Supreme Court of Ohio Office of Attorney Services, a copy of the affidavit required by Gov. Bar R. XII(2)(A)(6), and a certificate indicating service of this motion on all known parties and attorneys of record.

Mr. Benson understands that, if this motion is granted, he must file a notice of permission to appear *pro hac vice* and a copy of the order granting permission to appear with the Office of Attorney Services within thirty days of such order.

WHEREFORE, Dynege Marketing & Trade respectfully moves the Commission for permission for Glenn S. Benson to appear *pro hac vice* before the Commission in these proceedings.

Dated: September 23, 2022

Respectfully submitted,

/s/ David F. Proaño

David F. Proaño (0078838), Counsel of Record  
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**Willing to Accept Service by Email**

***COUNSEL FOR DYNEGY MARKETING AND  
TRADE, LLC***

## CERTIFICATE OF SERVICE

I certify on this 23rd day of September, 2022, that the foregoing document was filed using the Commission's Docketing Information System and was served by electronic mail on the following:

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/s/ David F. Proaño

David F. Proaño (0078838), Counsel of Record  
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# THE SUPREME COURT *of* OHIO

## OFFICE OF ATTORNEY SERVICES

### IN THE MATTER OF THE APPLICATION OF

Glenn S. Benson

**AFFIDAVIT OF APPLICANT**  
Gov. Bar R. XII, Section 2(A)(3)

### FOR PRO HAC VICE REGISTRATION

Glenn S. Benson, being first duly cautioned, swears or affirms as follows:

- a. I have never been disbarred from the practice of law.
- b. I have been admitted to the practice of law in the following jurisdictions (attach additional page if necessary):

New York

District of Columbia

- c. Choose one:

- ☒ I am not currently suspended from the practice of law in any jurisdiction where I have been admitted to practice.
- ☐ I am currently suspended from the practice of law in the following jurisdictions:

- d. Choose one:

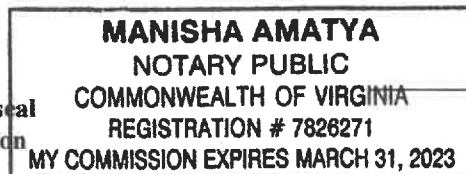
- ☒ I have not resigned from the practice of law with discipline pending in any jurisdiction where I have been admitted to practice.
- ☐ I have resigned from the practice of law with discipline pending in the following jurisdiction(s):

Glenn S. Benson

SIGNATURE OF APPLICANT

Sworn to or affirmed before me and subscribed in my presence the 31 day of August,  
20 22, in the state of Virginia and county of Fairfax.

\*Notary public's stamp/seal  
and commission expiration  
date are required.



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SIGNATURE OF NOTARY PUBLIC\*

# THE SUPREME COURT *of* OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

**Glenn Benson**

FOR PRO HAC VICE REGISTRATION

per Gov. Bar R. XII, Section 2(A)(3)

Certificate of  
PRO HAC VICE  
REGISTRATION

2022

Registration Number:  
PHV- 26242-2022

**Glenn Benson**

\_\_\_\_\_, having met the requirements of, and found to be in full compliance with, Section 2(A)(3) of Rule XII of the Rules for the Government of the Bar of Ohio, is hereby issued this certificate of pro hac vice registration in the state of Ohio.

To receive permission to appear pro hac vice in an Ohio proceeding, a motion requesting such permission must be filed with the tribunal in accordance with Section 2(A)(6) of Rule XII of the Rules for the Government of the Bar of Ohio.



Gina White Palmer  
Director, Attorney Services

**Expires December 31, 2022**

**This foregoing document was electronically filed with the Public Utilities  
Commission of Ohio Docketing Information System on**

**9/23/2022 12:53:32 PM**

**in**

**Case No(s). 22-0817-EL-CSS, 22-0806-EL-WVR, 00-2317-EL-GAG**

Summary: Motion for Leave to Appear Pro Hac Vice by Glenn Benson electronically  
filed by Mr. David F. Proano on behalf of Dynegy Marketing and Trade, LLC